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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS MOTION TO
EXCLUDE DEFENDANTS' DAMAGES
EXPERT WALTER BRATIC**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal its Motion to Exclude Defendants’ Damages Expert Walter Bratic (“Waymo’s Administrative
8 Motion”). Waymo’s Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 1 to Waymo’s Motion to Exclude Defendants’ Damages Expert Walter Bratic (“Waymo’s Motion”)	Entire document	Defendants
Exhibit 2 to Waymo’s Motion	Entire document	Waymo and Defendants

14 3. Exhibits to Waymo’s Motion contain information that Defendants have designated as
15 confidential and/or highly confidential.

16 4. Exhibits to Waymo’s Motion also contain or refer to trade secret information, which
17 Waymo seeks to seal. The portions of Waymo’s Opposition and the exhibits thereto identified above
18 contain, reference, and/or describe Waymo’s asserted trade secrets, including as misappropriated by
19 Defendants. Specifically, Exhibit 2 describes certain technical specifications of Waymo’s trade
20 secrets. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and are
21 valuable as trade secrets to Waymo’s business (Dkt. 25-31). The public disclosure of this information
22 would give Waymo’s competitors access to in-depth descriptions—and analysis—of the functionality
23 of Waymo’s autonomous vehicle system. Exhibit 2 to Waymo’s Motion also contains or refers to
24 confidential business information, including internal development costs, which Waymo maintains as
25 secret. If such information were made public, I understand that Waymo’s competitive standing would
26 be significantly harmed. Waymo’s request to seal is narrowly tailored to only the confidential
27 information.
28

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct, and that this declaration was executed in San Francisco, California, on November 27,
3 2017.

4 By /s/ Lindsay Cooper
5 Lindsay Cooper
6 Attorneys for WAYMO LLC

7 **SIGNATURE ATTESTATION**

8 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
9 filing of this document has been obtained from Lindsay Cooper.
10

11 /s/ Charles K. Verhoeven
12 Charles K. Verhoeven
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